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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
2 MARSHALL DIVISION
Case No. 2:08-cv-422 TJW

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4 DEPOSITION OF BETHANY J. MAYNARD
5 July 16, 2010

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7 PATTY BEALL, MATTHEW MAXWELL, TALINA McELHANY and
8 KELLY HAMPTON, individually and on behalf of all others
similarly situated,

9 Plaintiffs,

10 vs.

11 TYLER TECHNOLOGIES, INC., and EDP ENTERPRISES, INC.,
12 Defendants.

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14 APPEARANCES:

15 ZELBST, HOLMES & BUTLER, by
16 Ms. Chandra L. Holmes Ray
P.O. Box 365
17 411 Southwest Sixth Street
Lawton, Oklahoma 73502
18 Appeared on behalf of the Plaintiffs.

19 MORGAN, LEWIS & BOCKIUS, LLP, by
20 Mr. Paulo B. McKeeby
1717 Main Street, Suite 3200
Dallas, Texas 75201
21 Appeared on behalf of the Defendants.

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1 ask you a specific question. What would it depend
2 on as to whether or not -- what different types of
3 training would you provide that would differ
4 depending on whether or not a conversion had
5 already taken place?

6 A If I'm there to set up user security, that's
7 happening very early on and is not -- doesn't require
8 data to be in the system.

9 Q Okay.

10 A However, if you're doing general ledger training,
11 there may need to be the chart of accounts converted
12 into the system.

13 Q User security training, that would simply be
14 training as to maintaining the passwords and other
15 security devices associated with the software?

16 A And permissions.

17 Q But the data from the company's -- the client's old
18 system need not be converted at that point?

19 A No.

20 Q That's a true statement?

21 A Yes.

22 Q Do I understand correctly that Munis while you were
23 employed with Tyler had a separate department that
24 did the actual conversion of the information?

25 A Yes.

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1 Q You didn't convert the information as an
2 implementation specialist at Munis?

3 A No.

4 Q What was that? Was it called the conversion
5 department?

6 A I can't remember what they were called.

7 Q But it was a particular department?

8 A It wasn't me. I don't know. I don't know.

9 Q That's fine. Okay. Not employees that you would
10 have interacted with on a regular basis?

11 A Define on a regular basis. I mean during -- during a
12 conversion?

13 Q Yeah.

14 A Yes.

15 Q On what -- What was the context of the interaction?
16 What would you guys -- would you be -- would they
17 have questions for you?

18 A On the phone. I would be asking them why data didn't
19 come in, wasn't there, was missing, was wrong.

20 Q And that would be something that you would have
21 detected during the course of your training?

22 A Yes.

23 Q And when you're doing the actual training, I take
24 it -- let's put security training to one side, but
25 when you're doing the general ledger training or

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1 Q And in the context of requisition software, levels
2 of approval means what particular individuals have
3 approval rights as to particular purchases?

4 A Correct.

5 Q And obviously you need to know that from the
6 customer to be able to train the users?

7 A Yes.

8 Q Are you familiar with the term systems analysis?

9 A Yes.

10 Q I'm sorry. There's a different term that I'm going
11 to ask you about. Something called analysis
12 sessions?

13 A Yes.

14 Q Does an analysis session as it was used at Tyler
15 Munis refer to this initial type of training that
16 you just testified to concerning in this example
17 the approval chain with respect to requisition
18 software?

19 A What analysis session means to me is that each client
20 is different but the software remains the same, so
21 it's determining how the client's going to use the
22 software of the prescribed ways you can use it.

23 Q Is an analysis session something that you performed
24 as an implementation specialist?

25 A I conducted training sessions where we decided which

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1 STATE OF WISCONSIN)
2 MILWAUKEE COUNTY) SS.
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4 I, BETHANY J. MAYNARD, do hereby
5 certify that I have read the foregoing transcript of
6 proceedings, taken on the 16th day of July, 2010, at
7 710 North Plankinton Avenue, Milwaukee, Wisconsin,
8 and the same is true and correct except for the list
9 of corrections, if any, noted on the annexed errata
10 sheet.

11 Dated at _____,
12 _____, this _____ day of
13 _____, 2010.

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BETHANY J. MAYNARD

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1 CERTIFICATE OF NOTARY

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3 STATE OF MICHIGAN)

4) SS

5 COUNTY OF WAYNE)

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7 I, Jacquelyn S. Fleck, Certified Shorthand
8 Reporter, a Notary Public in and for the above county
9 and state, do hereby certify that the above deposition
10 was taken before me at the time and place hereinbefore
11 set forth; that the witness was by me first duly sworn
12 to testify to the truth, and nothing but the truth,
13 that the foregoing questions asked and answers made by
14 the witness were duly recorded by me stenographically
15 and reduced to computer transcription; that this is a
16 true, full and correct transcript of my stenographic
17 notes so taken; and that I am not related to, nor of
18 counsel to either party nor interested in the event of
19 this cause.

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22 Jacquelyn S. Fleck, CSR-1352, RPR, RMR, CRR

23 Notary Public,

24 Wayne County, Michigan

25 My Commission expires: 08-16-2012